

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

KELLY D. TEAL,)
v.)
Plaintiff,)
ATOKA COUNTY MEDICAL)
CENTER, a public trust, BEVERLY)
PICKETT, individually, and PAUL)
REANO, individually, jointly and)
severally,)
Defendants.)

Case No: 15-CV-199-SPS

DEFENDANTS' FINAL EXHIBIT LIST

Pursuant to the Court’s Scheduling Order [Dkt. No. 22] and LCvR 43.1, the defendants, Atoka County Medical Center, Beverly Pickett and Paul Reano (“Defendants”), hereby designate the following as their list of exhibits in the above-captioned matter.

No.	Date	Description	Bates No.	Expected to Use	May be Used
1.	01/22/2014	Application for Employment - Atoka County Medical Center (“ACMC”)	ACMC 000387 - 000390	X	
2.	09/23/2013	Redline Healthcare Staffing evaluation for Kelly Teal	ACMC 000070 - 000100		X
3.	01/02/2014	Redline Healthcare Staffing, LLC invoice to ACMC regarding Kelly D. Teal, R.N.	ACMC 000101		X
4.	08/29/2014	Redline Healthcare Staffing, LLC time record for Kelly D. Teal assigned to Coalgate Mary Hurley	ACMC 000116		X
5.	03/10/2014	EEOC Charge of Discrimination to McAlester Regional Health Center by Kelly D. Teal - sex and age discrimination and retaliation - 564-2014-00369	ACMC 000269		X

No.	Date	Description	Bates No.	Expected to Use	May be Used
6.	03/20/2014	EEOC Dismissal and Notice of Rights issued to Kelly D. Teal - 564-2014- 00369	ACMC 000271		X
7.	09/12/2013	McAlester Regional Health Center personnel action report for Kelly Team - termination	ACMC 000282		X
8.	09/12/2013	McAlester Regional Health Center employee counseling report for Kelly Teal - termination and attachments	ACMC 000283 - 000285; 000288 & 000290		X
9.	05/30/2013	McAlester Regional Health Center employee performance appraisal for Kelly Teal	ACMC 000302 - 000305		X
10.		Résumé of Kelly D. Teal R.N., B.S.N.	ACMC 000391 - 000397		X
11.	01/29/2014	Letter to Kelly Teal regarding offer of employment from ACMC	ACMC 000411 - 000412	X	
12.	01/29/2014	ACMC benefit election forms for Kelly Teal	ACMC 000521 & 000523		X
13.	01/29/2014	ACMC job description for Staff Registered Nurse-RN, Charge Nurse Manager RN, RN in the Emergency Room Department, RN Triage Nurse in the Emergency Room Department and Receipt of Job Description, all signed by Kelly Teal	ACMC 000367 - 000376 & 000366	X	
14.	01/29/2014	ACMC confidentiality acknowledgement, signed by Kelly Teal	ACMC 000364 - 000365	X	
15.	01/29/2014	ACMC substance abuse policy/procedure, signed by Kelly Teal	ACMC 000377 - 000382 & 000403	X	

No.	Date	Description	Bates No.	Expected to Use	May be Used
16.	01/29/2014	ACMC code of conduct service standards, signed by Kelly Teal	TEAL 000044 - 000055 and ACMC 000457	X	
17.	01/29/2014	ACMC General Orientation for Kelly Teal, signed by Kelly Teal	ACMC 000454 - 000456	X	
18.	01/29/2014	ACMC HIPAA Quiz taken by Kelly Teal	ACMC 000458 - 000459	X	
19.	01/29/2014	EMTALA OSHA Quiz taken by Kelly Teal	ACMC 000460 - 000461	X	
20.	08/08/2014	Transcript of Kelly Teal's recorded meeting with Beverly Pickett	ACMC 000960 - 001029 & TEAL 000400	X	
21.	08/08/2014	ACMC disciplinary action form for Kelly Teal with attached statements of Linda Goff, Hali Holcomb and R. Thompson, RN	ACMC 000408 & 000907 - 000910	X	
22.		Transcripts of Kelly Teal's meeting with PJ Schalski	ACMC 001030 - 001053 & TEAL 000401		X
23.	08/11/2014	ACMC disciplinary action form for Kelly Teal - termination	ACMC 000407	X	
24.	08/11/2014	ACMC payroll status change form for Kelly Teal - termination	ACMC 000406		X
25.	08/11/2014	Human Resource Report on K. Teal, RN	ACMC 000959		X
26.	08/19/2014	Letter to Kelly Diane Teal from Oklahoma Board of Nursing	TEAL 000133		X
27.	08/11/2014	Oklahoma Board of Nursing report of nursing practice incident regarding Kelly Teal	ACMC 000957 - 00958		X

No.	Date	Description	Bates No.	Expected to Use	May be Used
28.	12/02/2014	Letter from Oklahoma State Department of Health to Paul Reano regarding Medicare investigation and attachments	ACMC 000581 - 000590	X	
29.	09/23/2014	OESC discharge/general form of Kelly Teal	ACMC 000740 - 000742		X
30.	08/22/2014	Kelly Teal's OMES online application and notice report of applications	ACMC 000655 - 000667		X
31.	10/15/2014	Application for employment to EPIC Medical Center by Kelly Teal	ACMC 000003 - 000004		X
32.	2015	W-2 wage and tax statement for Kelly Teal from Coal County General Hospital	ACMC 000671		X
33.	12/02/2015	Coal County General Hospital employee action form for Kelly Teal - termination	ACMC 000675		X
34.	11/09/2015	Coal County General Hospital employee action form for Kelly Teal - new hire	ACMC 000676		
35.	10/08/2015	Application for employment to Coal County General Hospital by Kelly Teal	ACMC 000677 - 000678		X
36.	03/14/2016	Online application for employment to Trustaff by Kelly Teal	ACMC 000634 - 000636		X
37.	01/12/2016	Application for employment to Carter Healthcare by Kelly Teal	ACMC 000816 - 000822		X
38.	01/18/2016	Offer of employment to Kelly Teal from Carter Healthcare	ACMC 000824		X
39.	01/31/2016	Letter of resignation by Kelly Teal to Carter Healthcare	ACMC 00893		X
40.	02/26/2016	Carter Healthcare check inquiry report for Kelly Teal	ACMC 000894		X
41.	03/24/2016	Email to Brandon Morgan with LTC Services from Kelly Teal regarding formal grievance	ACMC 000902		X

No.	Date	Description	Bates No.	Expected to Use	May be Used
42.	03/27/2016	Letter to Brandon Morgan at LTC Services from Kelly Teal - formal grievance	ACMC 000904 - 000905		X
43.	2014	W-2 wage and tax statement for Kelly Teal from ACMC	TEAL 000217		X
44.	2012	Federal income tax return for Kelly Teal	TEAL 000260 - 000263; 000256; 000255; 000257; 000258; 000253; 000251		X
45.	2013	Federal and state income tax returns for Kelly Teal	TEAL 000154 - 000160; 000248 & 000252 and 000153		X
46.	2014	Federal and state income tax returns for Kelly Teal	TEAL 000146 - 00151 & 000249 - 000250		X
47.	05/28/2014	Office/outpatient visit for Kelly Teal with Dr. Melissa Gastorf	ACMC 000780 - 00782		X
48.	02/28/2014	Office/outpatient visit for Kelly Teal with Dr. Melissa Gastorf	ACMC 000783 - 00785		X
49.	11/18/2013	Office/outpatient visit for Kelly Teal with Dr. Melissa Gastorf	ACMC 00786 - 000788		X
50.	08/12/2013	Office/outpatient visit for Kelly Teal with Dr. Melissa Gastorf	ACMC 00789 - 000791		X
51.	05/03/2013	Office/outpatient visit for Kelly Teal with Dr. Melissa Gastorf	ACMC 000792 - 000794		X

No.	Date	Description	Bates No.	Expected to Use	May be Used
52.	12/17/2015	Notice of Claim pursuant to the Oklahoma Governmental Tort Claims Act to Coal County General Hospital by Kelly Teal	TEAL 000323 - 000324		X
53.	2014	Calendar/diary of Kelly Teal	TEAL 000325 - 000399		X
54.	04/27/2016	E-Verify for Kelly Teal from Grace Living Center	ACMC 000917		X
55.	04/19/2016	Application for employment by Kelly Teal to Grace Living Center	ACMC 000919 - 000922		X
56.	2016	Wage statements for Kelly Teal from Grace Living Center from 05/11/2016 to 05/25/2016 with attached time attendance and punch detail report, and expense report with receipts and payment check	ACMC 000946 - 000956		X
57.		Kelly Teal's legal nurse consultant course training materials - not yet produced by plaintiff			X
58.		List of cases reviewed by Kelly Teal - not yet produced by plaintiff			X
59.		Kelly Teal's medical records reflecting diagnosis of migraines - not yet produced by plaintiff			X
60.		Prescription for Flexeril for Kelly Teal - not yet produced by plaintiff			X
61.		All exhibits listed by plaintiff and not objected to by defendants			
62.		All demonstrative exhibits			
63.		All rebuttal exhibits			
64.		Deposition exhibits identified in portions of depositions designated or counter-designated, to the extent not objected to by defendants, and to the extent the designated portions are admitted into evidence			

No.	Date	Description	Bates No.	Expected to Use	May be Used
65.		All pleadings not objected to by defendants			

Respectfully submitted,

s/Tanya S. Bryant

Adam W. Childers, OBA #18673
Tanya S. Bryant, OBA #20170

-Of the Firm-

CROWE & DUNLEVY, P.C.
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102
(405) 235-7700
(405) 239-6651 (Facsimile)
adam.childers@crowedunlevy.com
tanya.bryant@crowedunlevy.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of June, I electronically transmitted the attached document to the Court Clerk using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

Brendan M. McHugh
P.O. Box 1392
Claremore, OK 74018
Brendan@lawinok.com
mchugh8@att.net
bmcq1990@gmail.com

Attorney for Plaintiff

s/Tanya S. Bryant

Tanya S. Bryant